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*Attorneys for Defendant*  
Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

NEIL LIEBICK, SHARON CLARK,  
individually and as guardian ad litem for  
JANE DOE 1, JANE DOE 2, and JOHN  
DOE; and JASON FRANKLIN,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC., COSTCO WHOLESALE CORP.,  
and DOES 1-10,

Defendants.

Case No. 2:25-cv-01300-DJC-DMC

**STIPULATION AND ORDER TO EXTEND  
DEFENDANTS' DEADLINE TO FILE  
RESPONSIVE PLEADING**

Removal Filed: May 5, 2025

1 Plaintiffs NEIL LIEBICK, SHARON CLARK, individually and as guardian ad litem for JANE  
2 DOE 1, JANE DOE 2, and JOHN DOE; and JASON FRANKLIN (“Plaintiffs”) and Defendants  
3 SAMSUNG ELECTRONICS AMERICA, INC. and COSTCO WHOLESALE CORP. (“Defendants”)  
4 (collectively “Parties”), through their respective counsel, hereby stipulate and agree as follows:

5 WHEREAS, on November 6, 2025, the Court granted in part and denied in part Defendants’  
6 Motion to Dismiss the Second Amended Complaint; (ECF No. 29);

7 WHEREAS, the Court’s Minute Order provides Plaintiffs twenty (20) days to file a Third  
8 Amended Complaint, setting a deadline of November 26, 2025 (ECF 29);

9 WHEREAS, under Federal Rule of Civil Procedure 12(a)(1)(A), Defendants’ current deadline to  
10 respond to the operative complaint is November 20, 2025, which precedes the Court-ordered deadline  
11 for any Third Amended Complaint;

12 WHEREAS, to conserve judicial and party resources and to avoid potentially duplicative filings,  
13 the Parties agree that Defendants’ deadline to file a responsive pleading should be extended to December  
14 17, 2025, which is 21 days after the current deadline for filing a Third Amended Complaint;

15 WHEREAS, this stipulation is made in good faith and not for the purpose of delay.

16 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their  
17 respective counsel of record, HEREBY STIPULATE and respectfully request that the Court enter an  
18 order extending Defendants’ deadline to file a responsive pleading from November 20, 2025 to December  
19 17, 2025.

20 **IT IS SO STIPULATED.**

21  
22 Dated: November 12, 2025

**GREENBERG TRAURIG, LLP**

23 By: /s/ Anna Yeung  
24 Robert J. Herrington  
25 Anna Yeung

26 Attorneys for Defendant  
27 SAMSUNG ELECTRONICS AMERICA, INC.  
28

1 Dated: November 13, 2025

**COOK LAW GROUP**

2 By: /s/ *Ronald J. Cook*  
3 Ronald J. Cook  
4 Attorney for Plaintiffs

5 Dated: November 14, 2025

**MAIRE & DEEDON**

6 By: /s/ *Patrick Deedon*  
7 Patrick Deedon  
8 Attorney for Defendant  
9 COSTCO WHOLESALE CORP.  
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**ORDER**

Pursuant to the Parties' Stipulation to Extend Defendants' Deadline to File Responsive Pleading and good cause appearing, the Court orders Defendants' deadline to file a responsive pleading is extended to December 17, 2025.

**IT IS SO ORDERED.**

Dated: November 14, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE